

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
MCALLEN DIVISION

EDINBURG ECONOMIC	§	
DEVELOPMENT CORPORATION	§	
vs.	§	Cause No. 21-CV-00454
DAN DAMON, INDIVIDUALLY	§	
AND IN HIS REPRESENTATIVE	§	
CAPACITY AS TRUSTEE OF	§	
THE DAN AND JACKIE DAMON FAMILY	§	
TRUST UDT AUGUST 17 1999;	§	
JACKIE DAMON, INDIVIDUALLY	§	
AND IN HER REPRESENTATIVE	§	
CAPACITY AS TRUSTEE OF	§	
THE DAN AND JACKIE DAMON FAMILY	§	
TRUST UDT AUGUST 17 1999; AND	§	
EDINBURG PLAZA, LLC	§	

**DEFENDANTS' RULE 26(A)(1) INITIAL DISCLOSURES**

In accordance with Rule 26(a)(1) of the Federal Rules of Civil Procedure, Defendants Dan Damon Individually and in his representative capacity of the Dan and Jackie Damon Family Trust UDT August 17, 1999, Jackie Damon Individually and in her representative capacity of the Dan and Jackie Damon Family Trust UDT August 17, 1999 and Edinburg Plaza, LLC , respectfully makes their mandatory disclosures as follows:

**A. Witnesses**

**The name and, if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless solely for impeachment, identifying the subjects of the information.**

**RESPONSE:**

Persons likely to have discoverable information may include, but may not be limited to the following:

Dan Damon  
P.O. Box 480  
La Quinta, CA 92247  
Physical address: 49491 Wayne St. Indio, CA 92201  
323-821-4737

Jacqueline Damon  
P.O. Box 480  
La Quinta, CA 92247  
Physical address: 49491 Wayne St. Indio, CA 92201  
909-518-6661

Edinburg Economic Development Corporation  
415 W University Dr, Edinburg, TX 78539  
956-388-8207

Augustin "Gus" Garcia, Jr.  
415 W University Dr, Edinburg, TX 78539  
956-388-8207

Former Direct of Edinburg Economic Development Corporation at the time of the sale of the referenced real estate

Varco Trenton Plaza, LLC  
222 N. Expressway  
Brownsville, Texas 78521  
Purchaser of the referenced real estate

Edwards Abstract & Title Company  
3111 W. Freddy Gonzalez Dr.  
Edinburg, Tx 78539  
956-383-3951  
Performed closing of the referenced real estate transaction.

## B. Documents

**A copy of, or a description by category and location of, all documents, electronically stored information, and tangible things that are in the possession, custody, or control of the party and that the disclosing party may use to support its claims or defenses, unless solely for impeachment.**

**RESPONSE:**

Defendants references any and all documents produced or to be produced by Plaintiff.

Other than documents already produced, Defendant has produced all documents in support of their defenses to Plaintiff.

**C. Computation of Damages**

**A computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered.**

**RESPONSE: NONE**

**D. Insurance Agreements**

**For inspection and copying as under Rule 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy party or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment.**

**RESPONSE: NONE**

DATED: February 9, 2022

Respectfully submitted,

SALINAS FLORES  
2011 N. CONWAY AVE  
MISSION, TX 78572  
Tel: (956) 584-3900  
Fax: (956) 580-9688

By: /s/Ricardo L. Salinas  
Ricardo L. Salinas  
Federal Bar No. 19693  
[rsalinaslaw@yahoo.com](mailto:rsalinaslaw@yahoo.com)  
Attorney for Defendant

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of a duplicate of the above and foregoing Rule 26(a)(1) Initial Disclosures of Plaintiff Elizabeth A. Gilmore has been served upon all opposing parties, or their attorneys of record, by either certified mail, return receipt requested, hand delivery, or telephonic or electronic document transfer on the 9<sup>th</sup> day of February, 2022.

Omar Ochoa, [oochoa@omarchoalaw.com](mailto:oochoa@omarchoalaw.com)

*/s/Ricardo L. Salinas*

Ricardo L. Salinas